

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CASE NO. 03-54498-C
LANDY, CHARLIE V.	§	
LANDY, PATRICIA A.	§	
	§	
DEBTOR(S)	§	CHAPTER 13 PROCEEDING

**DEBTORS EXPEDITED MOTION TO SELL REAL PROPERTY, PAY OFF
BASE PLAN AND RECEIVE DISCHARGE ORDER**

AN ORDER WILL BE ENTERED GRANTING THE RELIEF REQUESTED HEREIN WITHOUT FURTHER HEARING UNLESS A WRITTEN OBJECTION AND REQUEST FOR HEARING IS FILED WITH THE CLERK WITHIN TEN (10) DAYS OF THE DATE OF ISSUANCE OF THIS NOTICE. ANY SUCH OBJECTION MUST ALSO BE SERVED UPON THE MOVING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.

Comes now Debtor (so denominated whether individual or joint) and files this, Debtors Expedited Motion to Sell Real Property, Pay Off Base Plan and Receive Discharge Order. As grounds for this request, Debtors would show as follows:

I.

Debtor filed the petition under Chapter 13 of the Bankruptcy Code on August 13, 2003, the Plan was confirmed on December 12, 2003.

II.

Debtors are the owners of real property located at 5911 Autumn Lake, Bexar County, San Antonio, Texas 78222, Legal Description NCB 18264 BLK 24 Lot 11 (Lakeside UT-11). Debtors now wish to dispose of said real property and request permission to sell property. This property was a prior homestead exemption. The Debtors will sell the said property for \$100,000.00. There will be proceeds to pay off the base amount of the Chapter 13 Plan after the closing cost and fees. Attached is the contract for sale of property. Debtors closing date is set for February 28, 2007. Debtors would like to use the proceeds to pay off the base Chapter 13 Plan and for moving expenses.

III.

Debtors wish to pay off the base amount of the Chapter 13 Plan. Debtors have been in the Chapter 13 Plan over thirty (36) months.

PRAYER

WHEREFORE, the Debtors pray that this Court authorize the sale of the real property to the respective buyer and at the respective price set forth therein; and, further, that this Court make its Order that, upon completing the sale, Debtor be authorized to pay the base amount of the Chapter 13 Bankruptcy, receive a Discharge Order and keep the balance of the proceeds for moving expenses and a new home.

2/14/07

Respectfully submitted,

CHARLES J. BONDURANT
11825 IH 10 West, Suite 202
San Antonio, Texas 78230
(210) 690-2700 FAX: (210) 691-2862

/s/

Charles J. Bondurant
State Bar No.
ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Debtors' Expedited Motion to Sell Real Property, Pay Off the Base Plan and Receive Discharge Order has been mailed by United States first class mail, postage prepaid to:

U.S. Trustee
P.O. Box 1539
San Antonio, Texas 78295

Marion A. Olson, Jr.
Chapter 13 Trustee
1020 NE Loop 410, Suite 800
San Antonio, Texas 78209

Mr. & Mrs. Charlie V. Landy
5911 Autumn Lake
San Antonio, Texas 78222

Along with the attached list of creditors.

/s/

Charles J. Bondurant

Alliance One
PO Box 3101
Southeastern, PA 19398-3101

Allied Interstate
50-62N 19th Avenue, Suite 102
Phoenix, AZ 85015

American Medical Response
Lardlan Medical Tansportation
PO Box 847343
Dallas, TX 75284

Arrow Financial Services, LLC
5996 West Touhy Avenue
Niles, IL 60714-4610

Arrow Financial Services, LLC
PO Box 469005
Chicago, IL 60646-9005

Baptist Health System
PO Box 840333
Dallas, TX 75284-8333

Capital One
PO Box 34631
Seattle, WA 98124-1631

Charlie V. Landy
5911 Autumn Lake
San Antonio, TX 78222

Chrysler Financial
PO Box 5055
Southfield, MI 48086

Conn Credit Company
PO Box 2358
Beaumont, TX 77704

Countrywide Home Loans
7105 Corporate Drive
MS: PTX-B-65
Plano, TX 75024-3632

DEPT. OF HOUSING AND URBAN DEV
ALLIED INTERSTATE
PO BOX 530284
ATLANTA, GA. 30353-0284

Financial Recovery Services, Inc.
PO Box 385908
Minneapolis, MN 55438-5908

First Revenue Assurance
PO Box 34393
Seattle, WA 98124-1393

FMA Alliance, Ltd.
1811 North Freeway #900
Houston, TX 77060

Frost National Bank
Penn Credit Co.
PO Box 988
Harrisburg, PA 17108-0988

Hospatists of San Antonio
7300 San Pedro #405
San Antonio, TX 78216

Household Bank
Bankcard Services
PO Box 60102
City of Industry, CA 91716-0102

Internal Revenue Service
Attn: Special Procedures
300 E. 8th Street, STOP 5026AUS
Austin, TX 78701

IPC of Texas
PO Box 92729
Los Angeles, CA 90009-2729

ITT Financial
Asset Acceptance Corp.
PO Box 2036
Warren, MI 48090-2036

JC Penney's
PO Box 960001
Orlando, FL 32896-0001

Kevin Epstein
Chapter 11 Trustee
Office of the U.S. Trustee
P.O. Box 1539
San Antonio, Texas 78295-1539

MARION A OLSON
CHAPTER 13 TRUSTEE
1020 NE LOOP 410 #800
San Antonio, TX 78209

Meadowlawn Memorial Park
PO Box 200606
San Antonio, TX 78220-0606

National Furniture
2545 SW Military Drive
San Antonio, TX 78224

NCO Financial Systems, Inc.
PO Box 41417
Dept. 99
Philadelphia, PA 19101

NCO Financial Systems, Inc.
PO Box 41457
Philadelphia, PA 19101-1457

Northland Group, Inc.
PO Box 390846
Edina, MN 55439

Park Dansan
113 W. 3rd Avenue
PO Box 248
Gastonia, NC 28053

Patricia A. Landy
5911 Autumn Lake
San Antonio, TX 78222

Penn Credit Corporation
PO Box 988
Harrisburg, TX 17108-0988

Protection One
PO Box 79016
Phoenix, AZ 85062-9016

Providian Visa Card
PO Box 9539
Manchester, NH 03108-9539

Sears
86 Annex
Atlanta, GA 30386-0001

Smith, Roucher & Associates, Inc.
1456 Ellis Avenue
Jackson, MS 39204-2204

Spiegel Charge
FCNB Processing Center
9310 SW Gemini Drive
Beaverton, OR 97078-0001

Transworld Systems, Inc.
5880 Commerce Boulevard
Rohnert Park, CA 94928

US TRUSTEE
PO BOX 1539
SAN ANTONIO, TEXAS 78295-1539